

Schachat, Sandra
Page 1 of 2

From: dwimdtm@care2.com
Sent: Monday, October 13, 2003 9:20 PM
To: Pell, Jerry
Subject: Environmental Impact Statement for Tucson
Electric Power's proposed 345 kilovolt powerline

Dr. Jerry Pell
U.S. Department of Energy, Office of Fossil Energy (FE-27)
1000 Independence Avenue. SW
Washington, DC 20585

Dear Dr. Pell,

1 I am writing to urge you to withdraw the current draft
Environmental Impact Statement for Tucson Electric
Power's proposed 345 kilovolt powerline. This issue is very
important to me because although I live in the east, I have
been to the southwest five times in the past five years and
care deeply about the people and environment in this
unique, beautiful area.

Having removed invasive species from the Santa Fe River, I
have seen firsthand how horrible environmental destruction
can be. But I have also been to the Grand Canyon (among
other southwestern National Parks), witnessing the
invaluable beauty of Arizona. And I have an appreciation of
the rich cultural heritage of this area thanks to visits to
Bandelier and Mesa Verde in addition to countless
conversations with locals.

2 TEP's proposed "Western Route" and alternative "Crossover
Route" would carve through some of the most remote and
wild areas in Southeast Arizona, forever scarring the
beautiful and irreplaceable landscape of the Tumacacori
Highlands.

Comment No. 1

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project.

Comment No. 2

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Schachat, Sandra
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2 cont.	This area contains several roadless areas as well as a citizen's proposed Wilderness area home to black bears, Mexican spotted owls, lesser-long nosed bats and peregrine falcons as well as lesser known species such as the Sonora chub, Mexican vine snake, elegant trogon and the Gentry indigo bush. A jaguar was sighted in this area only two years ago.
3	The important goal of providing fully reliable electrical service to the city of Nogales and Santa Cruz County must be achieved. Unfortunately, instead of building the small transmission line necessary to achieve this goal, TEP has proposed a massive, environmentally destructive, and extremely controversial powerline designed to export power to Mexico.
4	The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills.
5	The recent blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a new draft EIS which fully and rigorously explores all available options-including a local power plant and smaller power lines which would not serve Mexico-to meet the important public interest of providing reliable energy service to Santa Cruz County.
	Sincerely, Sandra Schachat 12060 Wetherfield Lane Potomac, Maryland 20854

Comment No. 3

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

Comment No. 4

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 5

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Schmidt, Justin O.
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10/13/2003 19:53	5206849345	PAGE 01/01
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JUSTIN O. SCHMIDT, PhD 1961 W. Brichta Dr. Tucson, AZ 85745	Tel: 520 884-9345 ponerine@dakotacom.net Fax: 520 884-9345
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13 October, 2003	
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Dr. Jerry Pell Office of Fossil Energy U.S. Department of Energy Washington D.C. 20585	TO FAX: 202-318-7761
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	RE: "Tucson Electric Power Sahuarita-Nogales Transmission line DEIS"
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Dear Dr. Pell,

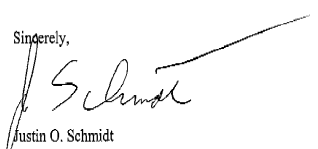
As a resident of Pima County with affiliations in Santa Cruz County of Arizona, I request that the TEP power line as proposed be eliminated or modified. The proposed "Western Route" is the longest of the choices, is the most expensive, and is the most environmentally destructive of all alternatives being considered. The "Crossover Route" is scarcely any better, in fact might even be worse. Both power line routes would needlessly and permanently bisect and destroy a swath within the citizen's proposed Wilderness Area.

If there were an urgency or dire emergency for the line, and no other alternatives were reasonable, then the line should be considered. Fortunately there is no need for a 345 kV line by either the TEP or other agencies. Simply stated most of the energy transmitted on such a line would not benefit Santa Cruz County; whereas a smaller, less obtrusive power line, such as a 115 kV line should be considered and would serve the needs of the County far better. A 115 kV line is economical, can easily be buried in sensitive areas near homes, and would serve the long-term needs of Santa Cruz County.

I cannot support the proposed routes or power voltage because they do not serve Santa Cruz County's interests, as originally intended under ACC order 62011. Moreover, they are an unnecessary economic, environmental, and culture burden on Southern Arizona. Please consider withdrawing the Draft Environmental Impact Statement and issuing an assessment that properly and openly analyzes and evaluates real solutions and alternatives to power needs in Santa Cruz County, and that includes at a minimum smaller power lines or locally run power plants.

Thank you for your consideration proposals to "do right" for Santa Cruz County and Southern Arizona.

Sincerely,



Justin O. Schmidt

Comment No. 1

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Comment No. 2

The ACC is vested with the state's authority to decide how it believes energy should be furnished within Arizona's borders (for example, the need for and effectiveness of transmission lines within its borders). Refer to the revised text in Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, that provides explanation of the jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA analysis.

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." In an applicant-initiated process, such as TEP's proposed project, the range of reasonable alternatives analyzed in detail in the EIS is directly related to the applicant's purpose and need.

A smaller transmission line in lieu of the proposed 345-kV line (e.g., 115-kV line) would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Comment No. 3

The Federal agencies concur with the commentor's statement that ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County, and does not reference the export of electricity to Mexico. However, TEP's stated purpose and need for the proposed project is a dual purpose and need of benefiting both southern Arizona and Mexico.

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis). Refer to the response to Comment 2 above regarding a 115-kV transmission line.

Schmidt, Justin O.
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JUSTIN O. SCHMIDT, PhD
1961 W. Brichta Dr.
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13 October 2003

Sue Kozacek
Acting Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, AZ 85701

RE: Tucson Electric Power Sahuarita-Nogales Transmission
line DEIS and needed Forest Plan Amendments

13 October 2003

Dear Ms Kozacek,

1 As an outdoor enthusiast and biologist, I find the Tumacacori and Atascosa Mountains to be an amazing and exceptional area for primitive recreation. A proposed TEP powerline will compromise and destroy the natural characteristics of the area.

I enjoy butterfly watching, hiking, biking, and recording insect sounds in the area. These pleasures will be affected by the powerline. The construction of the Western or Crossover Routes will be especially negative.


2 TEP proposes to build over 20 new miles of road for the there preferred route. The road density in the Tumacacori EMA is already above acceptable limits as set forth in the current Forest Plan: more road building, even with associated closures which are typically unsuccessful would be a major violation of the Forest Plan

1 A Forest Plan Amendment would only decrease the already dwindling supply of remote recreational experiences in the region and would impact many sensitive wildlife and plant species that are an important aspect of our southern Arizona natural heritage.

3 I urge you to deny the special use permit for the Western and Crossover Routes because they are not compatible with the current uses of the affected area

Many thanks for your consideration and efforts to preserve this fantastic area from unnecessary development.

Sincerely,


Justin Schmidt

Comment No. 1

Sections 3.1.2 and 4.1.2 present a description of the existing recreational opportunities and analyze the potential impacts to these resources from the proposed project, including impacts to areas classified as semi-primitive in the Coronado National Forest. Section 4.1.2 specifically evaluates impacts to ROS indicators such as remoteness and naturalness, both of which would have changes that are “inconsistent” with the existing ROS classes for much of the length of the Western and Crossover Corridors within the Coronado National Forest.

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project. Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to special status species.

Analysis of the proposed Forest Plan Amendment is contained in Appendix H.

Comment No. 2

The Tumacacori EMA of the Coronado National Forest in and of itself does not exceed road density limits set forth in the Forest Plan. Road density limits set forth in the Forest Plan are for the Coronado National Forest as a whole, not for individual land units or EMAs within the Coronado National Forest. Regarding the effectiveness of road closures, any authorization issued to implement the proposed project on the Coronado National Forest would contain terms and conditions to ensure road barrier effectiveness and maintenance, as appropriate. Based on these terms and conditions for ensuring the effectiveness of road closures, the proposed project is consistent with Forest Plan standards and guidelines for road density.

Comment No. 3

Sections 3.1 and 4.1 discuss the existing land use and analyze the potential impacts to these resources from the proposed project.

Schneller, Andrew J.
Page 1 of 1

Dr. Jerry Pell
U.S. Department of Energy, Office of Fossil Energy (FE-27)
1000 Independence Avenue. SW
Washington, D.C. 20585

Dear Mr. Pell:

October 6, 2003

I am submitting official comments regarding the "Tucson Electric Power Sahuarita-Nogales Transmission line DEIS"

1 The public and private lands in the Tumacacori and Atascosa Mountains are an exceptional area for primitive recreation and wildlife habitat – the powerline is incompatible with the area's natural characteristics, and I would hate to see an untrammeled tract of land sacrificed to a powerline that could be routed through an alternative location. The proposed Wilderness Area would be forever scarred, and the outstanding natural characteristics of the area would be lost. I helped map and designate portions of this amazing proposed Wilderness Area, and would be personally insulted and harmed if the area were

2 desecrated by a powerline. There are cleaner and less obtrusive means of generating and distributing power in the US. Please pursue alternative energy sources and its distribution. There are much less pristine areas where a power line can be placed. Please consider the plethora of alternatives to permanently scarring the Tumacacori and Atascosa Mountains.

3 The recent massive blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a new draft EIS which fully explores all options (including a local power plant and smaller power lines which would not serve Mexico) which would meet the important public interest of providing reliable energy service to Santa Cruz County.

I additionally would like to raise the following points:

4 The preferred Western Route is the longest, most expensive, and most environmentally damaging of all alternatives considered. The Crossover route is equally terrible.

5 There is no "Need" stated for a 345 kV line by either the applicant (TEP) or agencies – because most of the energy transmitted on the line would not benefit Santa Cruz County, why is the 345 kV, and not a smaller line, needed?

6 A smaller, less obtrusive powerline, such as a 115 kV line was not considered for any route. Why not? A 115 kV line is cheaper, can more easily be buried in sensitive areas near homes, and would serve the long-term needs of Santa Cruz County.

I do not support the proposed routes because they do not serve Santa Cruz County's interests, as originally intended under ACC order 62011. They are an unnecessary economic, environmental, and culture burden on Southern Arizona. Please consider withdrawing the Draft Environmental Impact Statement and issuing an assessment that properly analyzes real solutions to power needs in Santa Cruz County that include a smaller powerline and/or locally run power plant.

Sincerely,



Mr. Andrew J. Schneller
911 N. Perry Ave.
Tucson, AZ 85705

Comment No. 1

Sections 3.1.2 and 4.1.2 present a description of the existing recreational opportunities and analyze the potential impacts to these resources from the proposed project.

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project. Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project, including impacts to wildlife habitat.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Comment No. 2

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 3

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Comment No. 4

The affected environment of the Western Crossover Corridors is described in Chapter 3, and the potential environmental impacts (including socioeconomic impacts) from these alternatives are fully evaluated in Chapter 4.

Comment No. 5

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system..." In an applicant-initiated process, such as TEP's proposed project, the range of reasonable alternatives analyzed in detail in the EIS is directly related to the applicant's purpose and need.

A smaller transmission line (e.g., 115-kV line) in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Comment No. 6

ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County, and does not reference the export of electricity to Mexico. However, TEP's stated purpose and need for the proposed project is a dual purpose and need of benefiting both southern Arizona and Mexico.

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis). Refer to the response to Comment 5 above regarding a 115-kV transmission line.

Schneller, Andrew J.
Page 1 of 1

Sue Kozacek
Acting Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, AZ 85701




I am commenting in regards to the "Tucson Electric Power Sahuarita-Nogales Transmission line DEIS and needed Forest Plan Amendments"

1 The public and private lands in the Tumacacori and Atascosa Mountains are an exceptional area for primitive recreation and wildlife habitat – the proposed powerline is incompatible with the area's natural characteristics, and I would hate to see an untrammeled tract of land sacrificed to a powerline that could be avoided altogether or routed through an alternative location. I enjoy hiking and camping in this amazing scenery, and would probably never return to camp there if a powerline were looming in my viewshed. The area currently offers a practically unscarred viewshed (except of course for cattle grazing, which is another obsolete and incompatible use of our public lands). Our citizens proposed Wilderness Area would be forever scared, and the outstanding natural characteristics of the area would be lost with the addition of a powerline. I helped to map and designate portions of this amazing proposed Wilderness Area, and would be personally insulted and harmed if the area were desecrated by a powerline. There are cleaner and less obtrusive means of generating and distributing power in the US. Please help TEP pursue alternative energy sources and its distribution. There are much less pristine areas where a power line can be placed. Please consider the plethora of alternatives to permanently scarring the Tumacacori and Atascosa Mountains.

2 Additionally I would like to raise the following points:

- 1 cont.
- The Tumacacori and Atascosa Mountains are an exceptional area for primitive recreation – the powerline is incompatible with the natural characteristics there.
 - 3 • TEP proposes to build over 20 new miles of road for the Preferred Route. The road density in the Tumacacori EMA is already above acceptable limits as set forth in the current Forest Plan. More road building, even with associated closures (often unsuccessful) would be in gross violation of the Forest Plan
 - 4 • A Forest Plan Amendment would only decrease the already dwindling supply of remote recreational experiences in the region and would impact many sensitive wildlife and plant species that are an important aspect of our southern Arizona natural heritage.
 - 5 • I urge you to deny the special use permit for the Western and Central Routes because they are not compatible with the current uses of the affected area

Sincerely,


Mr. Andrew J. Schneller
911 N. Perry Ave.
Tucson, AZ 85705

10/6/03

Comment No. 1

Refer to the response to Comment 1 in the previous submittal from Andrew Schneller.

Comment No. 2

Refer to the response to Comment 2 in the previous submittal from Andrew Schneller.

Comment No. 3

The Tumacacori EMA of the Coronado National Forest in and of itself does not exceed road density limits set forth in the Forest Plan. Road density limits set forth in the Forest Plan are for the Coronado National Forest as a whole, not for individual land units or EMAs within the Coronado National Forest. Regarding the effectiveness of road closures, any authorization issued to implement the proposed project on the Coronado National Forest would contain terms and conditions to ensure road barrier effectiveness and maintenance, as appropriate. Based on these terms and conditions for ensuring the effectiveness of road closures, the proposed project is consistent with Forest Plan standards and guidelines for road density.

Comment No. 4

Analysis of the proposed Forest Plan Amendment is contained in Appendix H.

Sections 3.1.2 and 4.1.2 present a description of the existing recreational opportunities and analyze the potential impacts to these resources from the proposed project, including impacts to areas classified as semi-primitive in the Coronado National Forest. Section 4.1.2 specifically evaluates impacts to ROS indicators such as remoteness and naturalness, both of which would have changes that are "inconsistent" with the existing ROS classes for much of the length of the Western and Crossover Corridors within the Coronado National Forest.

Comment No. 4 (continued)

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to special status species.

Comment No. 5

Sections 3.1 and 4.1 present a description of the existing land use and analyze the potential impacts to these resources from the proposed project.

Schockett, Bruce
Page 1 of 1

no to wilderness power lines

From: Fotogbw@aol.com [SMTP:Fotogbw@aol.com]
To: Pell, Jerry
Cc:

Subject: no to wilderness power lines
Sent: 10/13/2003 4:29 PM
Importance: Normal

Mr. Pell

1 | Please pick the alternate more feasible route for the TEP
powerlines. The I19 corridor is shorter, less costly and will
not interfere with the natural wildlife. It is the latter that
persuaded me to move to this area.

2 | I've been a professional photographer in this region for
nearly 30 years and feel it would be a travesty to rip up this
god given area for power lines.

Please take a no action stand on this issue.

Bruce Schockett

Comment No. 1

Due to visual impacts through densely populated areas, and the potential impacts to cultural resources, the I-19 Corridor was eliminated from further analysis as viable action alternative (see Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Comment No. 2

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project.

Schweikhardt, Erik
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----- Forwarded by Susan K Kozacek/R3/USDAFS on
10/16/2003 05:34 PM -----
eps@email.arizona.edu
10/11/2003 11:11 PM

To: skozacek@fs.fed.us
cc:

Subject: Environmental Impact Statement
for Tucson Electric Power's
proposed 345 kilovolt powerline

Ms. Sue Kozacek
Coronado National Forest
Federal Building, 300 West Congress
Tucson, AZ 85701

Dear Ms. Kozacek,

1 I am writing to urge you to withdraw the current draft
Environmental Impact Statement for Tucson Electric
Power's proposed 345 kilovolt powerline.

2 TEP's proposed "Western Route" and alternative "Crossover
Route" would carve through some of the most remote and
wild areas in Southeast Arizona, scarring the beautiful and
irreplaceable landscape of the Tumacacori Highlands. This
area contains several roadless areas as well as a citizen's
proposed Wilderness area home to black bears, Mexican
spotted owls, lesser-long nosed bats and peregrine falcons as
well as lesser known species such as the Sonora chub,
Mexican vine snake, elegant trogon and the Gentry indigo
bush to name only a few of the diverse species of life which
call this area home.

Comment No. 1

The commentor's opinion that the Draft EIS should be withdrawn is noted.

Comment No. 2

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

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TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

Schweikhardt, Erik
Page 2 of 2

3 The important goal of providing fully reliable electrical service to the city of Nogales and Santa Cruz County must be achieved. Unfortunately, instead of building the small transmission line necessary to achieve this goal, TEP has proposed a massive, environmentally destructive, and extremely controversial powerline designed to export power to Mexico.

4 The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills. I ask you to consider this: what sort of policy and planning does not consider every other option, and alternative to achieve the greatest success in every way? Not a wise method of management.

5 The recent blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a new draft EIS which fully and rigorously explores all available options to meet the important public interest of providing reliable energy service to Santa Cruz County. I thank you in advance for listening, and I trust that you will make the best possible decision in accordance to citizen interest. Thank you and good day to you!!

Sincerely,

ERIK SCHWEIKHARDT
3950 E. BLACKLIDGE DR. APT. 214
TUCSON, Arizona 85712

Comment No. 4

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 5

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Scott, Mary
Page 1 of 2

FROM : Mary Scott
2856 Monogram Avenue
Long Beach, CA 90815

Birding America
www.birdingamerica.com
Mary Scott Photography
www.maryscottphotography.com

Dr. Jerry Pell
Office of Fossil Energy
U.S. Department of Energy
Washington D.C. 20585
Jerry.Pell@hq.doe.gov
FAX: 202-318-7761

October 13, 2003

RE: Tucson Electric Power Sahuarita-Nogales Transmission line DEIS

Dear Dr. Pell:

I am a professional wildlife photographer and Internet birding specialist. I am also a lawyer and a businesswoman ~ I currently manage commercial properties in California. I was previously a corporate insurance executive in downtown Manhattan, and I spent almost a decade as the Risk Manager for MassMutual. I have no quarrel with necessary, carefully considered development.

I spent most of three years from 1999 to 2002 traveling around America visiting birding hotspots. I have created photo-essays on more than 190 birding hotspots in 22 states. These are available on my website, Birding America. One of the goals in my travels was to find the most pristine, bird-rich area of America, with the hope of establishing a residence there to serve as a base for my wildlife photography. Of all the places I visited, the area of southeastern Arizona between Green Valley, Nogales, and Arivaca was the most appealing. I now have a second home in Arivaca, Arizona. I often drive the Ruby Road from Arivaca to Nogales, and hike Sycamore Canyon, in my photographic pursuits.

It is rare to find huge expanses of wilderness anywhere in the contiguous 48 states. those few large tracts of wilderness that exist are precious to all of us. The Tumacacori and Atascosa Mountains are fabulous places ~ home to a huge diversity of wildlife and endless opportunities for outdoor enjoyment in an unspoiled setting. I am heartsick that the pristine nature of this resource may be lost forever for an ill-considered and unnecessary power project.

1 I have studied the materials made available regarding the TEP Sahuarita-Nogales Transmission line. I find absolutely no justification for a 345 kV line anywhere in the documents. Further, as the purpose of this project, according to ACC order 62011, was to serve the interests of Santa Cruz County, I am shocked that this line is even under consideration. This is a highly rural area, with limited population, and no economic need

Comment No. 1

Chapter 3 describes the affected environment of the area and Chapter 4 evaluates the potential impacts of the proposed project, including potential impacts to the resources (Sections 3.1.2 and 4.1.2, Recreation; and Section 3.3 and 4.3, Biological Resources) and areas cited by the commentor.

Comment No. 2

ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County, and does not reference the export of electricity to Mexico. However, TEP's stated purpose and need for the proposed project is a dual purpose and need of benefiting both southern Arizona and Mexico.

Comment No. 3

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

The Federal agencies do not have any information suggesting that any power plant construction in Mexico is reliant upon or otherwise connected to TEP's proposed project. Therefore, the potential for construction of power plants in Mexico is not a connected action and is not analyzed in Chapter 4, Environmental Effects, of the EIS.


Scott, Mary
Page 2 of 2

FROM FAX NO. : 3015893771 Oct. 13 2003 02:13PM P2

1
cont. | for such a line. It appears that this line is being thrust on a region and population that do
not have the same political savvy and power as those who are attempting to serve other
interests by this project. The "Western Route" and "Crossover Route" are both terrible
assaults on our precious wilderness areas. To inflict this type of damage on a unique
and wonderful landscape without extreme necessity is unconscionable.

3 | Why not truly serve the needs of the area with a small, locally run power plant? Or, is
this just an effort to put a power plant across the border where there will be minimal
environmental protections on emissions, etc.?

Please register my protest, and urge "NO ACTION" on this proposal.

Sincerely,

Mary Scott
Long Beach, California
Arivaca, Arizona

Comment No. 3 (continued)

Chapter 5, Cumulative Effects, of the Final EIS has been augmented to discuss the growth of electricity demand in Mexico and the United States and the potential for new power plants, and to describe qualitatively the potential impacts in the United States. (including air quality impacts) from power plant construction in southern Arizona and Sonora, Mexico. Chapter 5 has also been revised to describe the regulation of power plants in Mexico (including coordination between the United States and Mexico), potential fuel sources, and associated emissions.

Seever, Nancy
Page 1 of 1

----- Forwarded by Susan K Kozacek/R3/USDAFS on
10/16/2003 06:04 PM -----
"Nancy Seever" <nvseev@azgalaxyonline.com>
09/20/2003 08:01 PM

To: "skozacek@fs.fed.us" <skozacek@fs.fed.us>
cc:
Subject: Tucson Electric Power Sahuarita Nogales Line
DEIS

To: Susan Skozacek

1 Surely you must understand what a loss it would be to the
lands presumably needed for this power ploy. I have been
blessed to visit these areas which so enrich our state. People
who know much more about it than I do are convinced there
are other less intrusive ways to go. Why not on the side
of I-19? We who love this country know how hard it is to
replace the damage done. Please, Please listen to us, and
maybe to that still small voice within yourselves, to save the
magnificent canyons and grasslands which can never be
replaced.

Best regards.

Nancy Seever
nvseev@azgalaxyonline.com
2003-09-20

Comment No. 1

The commentor's suggestion of building a line adjacent to the existing transmission line in the I-19 corridor was considered but eliminated from further analysis in the EIS (see Section 2.1.5 of the Final EIS).

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to vegetation (Sections 3.3.2 and 4.3.2).

Shainen, Lee
Page 1 of 1

From: lee shainen [lshainen@dakotacom.net]
Sent: Wednesday, October 01, 2003 4:16 PM
To: Pell, Jerry
Cc: ducote@azstarnet.com
Subject: power lines and vistas

Dear Jerry,

Have you spent much time in S. Az? If you have, you know how fragile and beautiful the desert and forests are. If you have traveled much, you would also know how open spaces are disappearing around the planet. I'm not sure if I can put into words how much such vistas mean to the human spirit. I believe it is in such views of uninterrupted sky and land that we reconnect with our deep history, a sense of timelessness, and we are reminded of what this world was once like and what are ancient part in it was. From such places, comes hope. From such places comes art, peace of mind, creativity, the ability to look at life and its challenges anew. It is an essential vantage point. Without it, there is only the ever descending spiral of busyness and restlessness. We need reference points to measure where we are. S. Az is still such a space. Please, for everyone that comes after us, and all those who take such nourishment there, don't allow the power lines to compromise the sacred trust of our public lands.

Thank you for considering the human spirit and our collective future in your thinking about this,

Lee Shainen
(520)577-8566

Comment No. 1

The Federal agencies note the commentor's opposition to the proposed project.